

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Verizon Wireless)	
)	WT Docket No. 01-184
Petition for Partial Forbearance)	
From the Commercial Mobile Radio)	
Services Number Portability Obligation)	

**SBC COMMUNICATIONS INC.
REPLY COMMENTS**

SBC Communications, Inc., on its own behalf and on behalf of its local exchange carriers,¹ (SBC) submits its reply comments in support of Verizon Wireless' petition for partial forbearance from the Commercial Mobile Radio Services ("CMRS") number portability obligation.²

The requirement that CMRS providers implement local number portability (LNP) is unnecessary. The level of competition in the wireless marketplace refutes the need for this regulatory intrusion. What's more, the requirement is a costly burden — not only for the wireless industry, but for wireline service providers, as well.

The original intent of the Commission's CMRS LNP mandate was to promote competition. Yet, today, the CMRS market is highly competitive. The inability to retain telephone numbers has not deterred competition in this marketplace.

With the implementation of wireless LNP, wireline service providers will bear significant costs to upgrade their operational support systems, e.g. increasing capacity

¹ These local exchange carriers include the Ameritech operating companies (Illinois Bell Telephone Company, Indiana Bell Telephone Company, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.), Nevada Bell Telephone Company, Pacific Bell Telephone Company, Southern New England Telephone, Southwestern Bell Telephone Company, and SBC Telecom.

² Verizon Wireless' Petition Pursuant to 47 U.S.C. § 160 for Partial Forbearance from the Commercial Mobile Radio Services Number Portability Obligation (filed July 26, 2000) ("Petition"); see Public Notice, *WTB Seeks Comment on Wireless LNP Forbearance Petition Filed By Verizon Wireless*, WT Docket 01-184, DA 01-1872 (August 7, 2001).

and memory to the Local Service Management System (“LSMS”). These upgrades will be necessary to handle porting of wireless numbers. Wireline service providers will expect to recover any costs incurred to facilitate wireless LNP. Such cost recovery would increase the current end-user surcharge. The end result of this regulatory obligation will be:

- no appreciable improvement in competition among wireless providers,
- increased costs and resource diversion incurred by wireline carriers, and
- lost benefits to consumers.

CONCLUSION

Even without LNP, competition within the CMRS marketplace is stronger today than when the Commission first imposed the CMRS LNP rules in 1997. Given the present high level of competition within the wireless industry, implementation of wireless LNP is an unnecessary and costly burden on both the wireless and wireline industries and, ultimately, the consumer. Therefore, SBC supports Verizon Wireless’ petition for partial forbearance to implement wireless LNP.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Regina Ragucci, do hereby certify that on this 22nd day of October 2001, Reply Comments of SBC Communications Inc. in WT Docket No. 01-184, was served via hand delivery to the parties listed below.

/s/

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